

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CITY OF SOMERVILLE,

Plaintiff,

v.

SHAWN WILLIAMS, as SUPERVISOR OF
PUBLIC RECORDS,

Defendant.

CIVIL ACTION
NO. 1:15-cv-12331

**DEFENDANT'S MOTION TO DISMISS FOR LACK OF JURISDICTION OR FOR
FAILURE TO STATE A CLAIM UPON WHICH RELIEF CAN BE GRANTED**

Defendant Shawn Williams, Massachusetts Supervisor of Public Records, moves to dismiss the complaint for lack of jurisdiction under Fed. R. Civ. P. 12(b)(1) or for failure to state a claim for relief under Fed. R. Civ. P. 12(b)(6). The reasons for this motion are set forth in the accompanying memorandum of law.

Respectfully submitted,

SHAWN WILLIAMS, as SUPERVISOR OF
PUBLIC RECORDS

By his attorney,

MAURA HEALEY
ATTORNEY GENERAL

/s/ Sookyong Shin

Sookyong Shin, BBO No. 643713

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August 7, 2015

CERTIFICATION UNDER LOCAL R. 7.1(A)(2)

I certify that in June 2015 I had several conversations with plaintiff's counsel in an effort to narrow or resolve the issues presented by this motion. On or about July 2, 2015, plaintiff's counsel informed me that I should move forward with the motion.

/s/ Sookyoung Shin
Sookyoung Shin
Assistant Attorney General

CERTIFICATE OF SERVICE

I hereby certify that the above document will be served on August 7, 2015, by electronic notice for registered counsel and a copy will be served by first-class mail, postage pre-paid, for non-registered counsel.

/s/ Sookyoung Shin

Sookyoung Shin
Assistant Attorney General